

UNITED STATES DISTRICT COURT  
for the  
Eastern District of Michigan

United States of America  
v.

Christopher Wade

Case No. 24-30290

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of July 23, 2024 in the county of Wayne in the  
Eastern District of Michigan, the defendant(s) violated:

*Code Section*  
18 U.S.C. § 922(g)(1)

*Offense Description*  
Felon in possession of a firearm.

This criminal complaint is based on these facts:  
See attached Affidavit

☐ Continued on the attached sheet.

Sworn to before me and signed in my presence  
and/or by reliable electronic means.

Date: July 25, 2024

City and state: Detroit, MI

  
*Complainant's signature*

TFO Bradley Tobel , ATF  
*Printed name and title*

  
*Judge's signature*

Hon. Kimberly G. Altman, United States Magistrate Judge  
*Printed name and title*

**AFFIDAVIT**

I, Bradley Tobel, being duly sworn, depose and state the following:

**I. INTRODUCTION**

1. I am a Police Officer with the Detroit Police Department and a Task Force Officer (TFO) with the Bureau of Alcohol, Tobacco, Firearms and Explosives (“ATF”). I have been employed as a police officer with the Detroit Police Department since April 2016. I am an “investigative or law enforcement officer of the United States” within the meaning of Title 18, United States Code, Section 2510(7), and I am empowered to conduct investigations and make arrests of offenses enumerated under federal law. I am currently assigned to the ATF Detroit Field Division’s Firearms Investigations Team (FIT).

2. I have received extensive training at and successfully graduated from the Detroit Police Training Academy as a Police Officer. As a Detroit Police Officer, I have worked in specialized units including the DPD 9th Precinct Detective Bureau, and 9th Precinct Special Operations Unit. During my time in law enforcement, I have participated in numerous criminal investigations involving firearms crimes, armed drug tracking violations, and offenses by criminal street gangs, among others.

3. I make this affidavit from personal knowledge based on my participation in this investigation, including interviews conducted by myself and/or other law enforcement agents, communications with others who have personal

knowledge of the events and circumstances described herein, review of reports by myself and/or other law enforcement agents, and information gained through my training and experience. The information outlined below is provided for the limited purpose of establishing probable cause and does not contain all the information known to law enforcement related to this investigation.

4. The ATF is currently conducting a criminal investigation concerning Christopher WADE (WADE), for violations of 18 U.S.C. § 922(g)(1), felon in possession of a firearm.

## **II. PROHIBITED STATUS**

5. I reviewed records related to WADE's criminal history and learned the following:

- a. On December 16, 2019, WADE pleaded guilty to one (1) count of Felony discharge of a firearm in or at a building, and one (1) count of felony carrying a concealed weapon. WADE was sentenced to three (3) years of probation with the Michigan Department of Corrections.
- b. On March 19, 2021, WADE pleaded guilty to one (1) count of felony possession of burglary tools, in the Third Judicial Circuit Court, Wayne County, and was sentenced to (3) years of Probation.

6. On July 24, 2024, I interviewed WADE. After waiving his rights under Miranda, Wade acknowledged that he is aware of his prohibited status and knows he is not allowed to possess any firearms.

## **II. PROBABLE CAUSE**

7. On July 23, 2024, at approximately 5:40 p.m., DPD officers responded to the area of Woodward and Adams on reports of a black male, wearing a white t-shirt and carrying a black backpack, firing shots. A DPD officer received real-time updates on the shooter's location at Woodward and Adams and learned that the shooter had placed the firearm into his backpack and walked off.

8. The officers arrived at Woodward and Adams, and observed WADE, who matched the shooter's description and was carrying a black backpack. Officers approached WADE, detained him, and searched his backpack. Officers located a silver and black 9mm Smith and Wesson model SD9VE firearm, bearing serial number HFS8104, the firearm contained an empty magazine.

9. A LEIN check revealed WADE did not have a Concealed Pistol License. WADE was arrested for felony carrying a concealed weapon, felon in possession, and reckless discharge of a firearm.

10. I reviewed green light camera footage in the area, which showed an individual matching the description of WADE appearing to shoot a firearm indiscriminately, and in the general direction of a black Kia Telluride.

11. On July 24, 2024, I contacted ATF Interstate Nexus Expert, Special Agent Jimmy Pharr, and provided him information about the Smith and Wesson, 9mm model SD9VE handgun. SA Pharr concluded that the firearm was manufactured outside the State of Michigan and is a firearm as defined in Title 18 U.S.C., Chapter 44, Section 921(a)(3).

### III. CONCLUSION

12. There is probable cause that on July 23, 2024, in the Eastern District of Michigan, Christopher WADE knowingly possessed a firearm after having been convicted of an offense punishable by a term of imprisonment of more than one year, in violation of Title 18 U.S.C. Section 922(g).



Bradley Tobel, Task Force Officer  
Bureau of Alcohol, Tobacco, Firearms and  
Explosives

Sworn to before me and signed in my presence  
And/or by reliable electronic means



Honorable Kimberly G. Altman  
United States Magistrate Judge

Dated: July 25, 2024